

EXHIBIT A.3

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK SOKOLOW, et al.,

Plaintiffs,

Civ. No. 04-397 (GBD) (RLE)

v.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

**THE GOLDBERG PLAINTIFFS’
REQUEST TO PRODUCE DOCUMENTS AND THINGS
(Nos. 1-10)**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure and the Local Rules of this Court, plaintiffs Karen Goldberg, Chana B. Goldberg, Esther Z. Goldberg, Yitzhak S. Goldberg, Shoshana M. Goldberg, Eliezer S. Goldberg, Yaakov M. Goldberg and Tzvi Y. Goldberg (“Plaintiffs”), by counsel, request that Defendants the Palestinian Authority and the Palestine Liberation Organization produce the documents and things described below to Plaintiffs’ counsel within 30 days of the service of these requests.

INSTRUCTIONS AND GENERAL DEFINITIONS

1. Defendants shall respond to these requests as required by the Federal Rules of Civil Procedure and the Local Rules of this Court. The definitions and rules of construction set forth in the Federal Rules of Civil Procedure and the Local Rules of this Court are incorporated by reference herein and govern these requests.

SPECIFIC DEFINITIONS

1. “PA” means and refers to defendant The Palestinian Authority and any ministry, agency, division, bureau, department or instrumentality thereof.

2. “PLO” means and refers to defendant The Palestine Liberation Organization and any agency, division, bureau, department or instrumentality thereof.

3. “Defendants” means and refers collectively to Defendants PA and PLO and any ministry, agency, division, bureau, department or instrumentality thereof.

4. “PA Martyr Form and File” in respect to any deceased or injured person, means and refers to the complete paper form and file regarding that person from the PA’s Ministry of Social Affairs, or any predecessor or successor entity thereto. The documents produced by defendants as Bates 02:006827-34 are an illustrative example of a PA Martyr Form and File.

5. “PA Prisoner Form and File” in respect to any person who is or was a prisoner, means and refers to the complete paper form and file regarding that person from the PA’s Ministry of Prisoner Affairs, or any predecessor or successor entity thereto. The existence of PA Prisoner Forms and Files was confirmed in the deposition of Jawad Amawi in the matter of *Klieman v. Palestinian Authority* at pp. 51; 64.

6. “PLO Martyr File” in respect to any deceased or injured person, means and refers to the complete paper file from the PLO’s Social Affairs Institution, or any predecessor or successor entity thereto. The existence of PLO Martyr Files is evidenced by the document produced by defendants in the matter of *Gilmore v. Palestinian Authority* as Bates 06:000086.

7. “PSS” means and refers to the PA’s Preventive Security Service.

8. “GIS” means and refers to the PA’s General Intelligence Service.

9. “NSF” means and refers to the PA’s National Security Forces.

10. “MI” means and refers to the PA’s Military Intelligence.

11. “Force 17” means and refers to PA’s Presidential Security Force.

12. “PAP” means and refers to the PA’s civil police force.

13. The “Terrorist Attack” means and refers to the January 29, 2004, terrorist bombing attack from which the Plaintiffs’ action arises.

REQUESTS FOR DOCUMENTS AND THINGS

1. All documents concerning the Terrorist Attack, including without limitation:
 - a. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of the PSS.
 - b. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of the GIS.
 - c. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of the NSF.
 - d. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of the MI.
 - e. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of Force 17.
 - f. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of the PAP.
2. A complete copy of the broadcast portions of which were contained in the audiovisual file disclosed to defendants by plaintiffs by email on October 23, 2012 at 5:47 AM.
3. All documents concerning Ali Ja’ara (“Ja’ara”), including without limitation:
 - a. The complete personnel files for Ja’ara from all positions and jobs held by Ja’ara in the PA and/or PLO and from all work and employment performed by Ja’ara for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Ja'ara in the PA and/or PLO and of all work and employment performed by Ja'ara for the PA and/or PLO, between January 1, 2000 and the date of his death; (ii); the rank or ranks held by Ja'ara between January 1, 2000 and the date of his death, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Ja'ara held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Ja'ara between January 1, 2000 and the date of his death.

d. All documents concerning all payments made and all benefits provided to Ja'ara's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Ja'ara's death, including without limitation the PA Martyr Form and File, and the PLO Martyr File, concerning Ja'ara.

e. All documents concerning Ja'ara in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Ja'ara in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Ja'ara in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Ja'ara in the paper, computerized, electronic or other files or archives of the MI.

i. All documents concerning Ja'ara in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Ja'ara in the paper, computerized, electronic or other files or archives of the PAP.

k. All broadcasts on PA TV concerning Ja'ara, including without limitation a complete copy of the broadcast portions of which were contained in the audiovisual file disclosed to defendants by plaintiffs by email on July 8, 2012, at 11:58 PM.

4. All documents concerning Abdel Rahman (Zaher) Yousuf Abdel Rahman Makdad ("Makdad"), including without limitation:

a. The complete personnel files for Makdad from all positions and jobs held by Makdad in the PA and/or PLO and from all work and employment performed by Makdad for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Makdad in the PA and/or PLO and of all work and employment performed by Makdad for the PA and/or PLO, between January 1, 2000 and today; (ii) the rank or ranks held by Makdad between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Makdad held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Makdad between January 1, 2000 and today.

d. All documents concerning all payments made and all benefits provided to Makdad and/or Makdad's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Makdad's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Makdad.

e. All documents concerning Makdad in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Makdad in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Makdad in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Makdad in the paper, computerized, electronic or other files or archives of the MI.

i. All documents concerning Makdad in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Makdad in the paper, computerized, electronic or other files or archives of the PAP.

k. All broadcasts on PA TV concerning Makdad.

5. All documents concerning Ahmed Salah Ahmed Salah ("Salah"), including without limitation:

a. The complete personnel files for Salah from all positions and jobs held by Salah in the PA and/or PLO and from all work and employment performed by Salah for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Salah in the PA and/or PLO and of all work and employment performed by Salah for the PA and/or PLO, between January 1, 2000 and today; (ii) the rank or ranks held by Salah between January 1, 2000 and today, in all

such positions, jobs, work and employment; and (iii) the specific time periods during which Salah held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Salah between January 1, 2000 and today.

d. All documents concerning all payments made and all benefits provided to Salah and/or Salah's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Salah's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Salah.

e. All documents concerning Salah in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Salah in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Salah in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Salah in the paper, computerized, electronic or other files or archives of the MI.

i. All documents concerning Salah in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Salah in the paper, computerized, electronic or other files or archives of the PAP.

k. All broadcasts on PA TV concerning Salah.

6. All documents concerning Halmi Abdel Karim Hamash ("Hamash"), including without limitation:

a. The complete personnel files for Hamash from all positions and jobs held by Hamash in the PA and/or PLO and from all work and employment performed by Hamash for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Hamash in the PA and/or PLO and of all work and employment performed by Hamash for the PA and/or PLO, between January 1, 2000 and today; (ii) the rank or ranks held by Hamash between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Hamash held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Hamash between January 1, 2000 and today.

d. All documents concerning all payments made and all benefits provided to Hamash and/or Hamash's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Hamash's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Hamash.

e. All documents concerning Hamash in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Hamash in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Hamash in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Hamash in the paper, computerized, electronic or other files or archives of the MI.

i. All documents concerning Hamash in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Hamash in the paper, computerized, electronic or other files or archives of the PAP.

k. All broadcasts on PA TV concerning Hamash.

7. All documents concerning Ahmed Mohammed Ahmed Sa'ad ("Sa'ad"), including without limitation:

a. The complete personnel files for Sa'ad from all positions and jobs held by Sa'ad in the PA and/or PLO and from all work and employment performed by Sa'ad for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Sa'ad in the PA and/or PLO and of all work and employment performed by Sa'ad for the PA and/or PLO, between January 1, 2000 and today; (ii) the rank or ranks held by Sa'ad between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Sa'ad held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Sa'ad between January 1, 2000 and today.

d. All documents concerning all payments made and all benefits provided to Sa'ad and/or Sa'ad's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Sa'ad's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Sa'ad.

e. All documents concerning Sa'ad in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Sa'ad in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Sa'ad in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Sa'ad in the paper, computerized, electronic or other files or archives of the MI.

i. All documents concerning Sa'ad in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Sa'ad in the paper, computerized, electronic or other files or archives of the PAP.

k. All broadcasts on PA TV concerning Sa'ad.

8. All documents concerning Mohammed Issa Mahmoud Ma'ali ("Ma'ali"), including without limitation:

a. The complete personnel files for Ma'ali from all positions and jobs held by Ma'ali in the PA and/or PLO and from all work and employment performed by Ma'ali for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Ma'ali in the PA and/or PLO and of all work and employment performed by Ma'ali for the PA and/or PLO, between January 1, 2000 and today; (ii); the rank or ranks held by Ma'ali between January 1, 2000 and today, in all

such positions, jobs, work and employment; and (iii) the specific time periods during which Ma'ali held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Ma'ali between January 1, 2000 and today.

d. All documents concerning all payments made and all benefits provided to Ma'ali and/or Ma'ali's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Ma'ali's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Ma'ali.

e. All documents concerning Ma'ali in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Ma'ali in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Ma'ali in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Ma'ali in the paper, computerized, electronic or other files or archives of the MI.

i. All documents concerning Ma'ali in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Ma'ali in the paper, computerized, electronic or other files or archives of the PAP.

k. All broadcasts on PA TV concerning Ma'ali.

9. All documents concerning Ali Mohammed Hamed Abu-Halail ("Abu-Halail"), including without limitation:

a. The complete personnel files for Abu-Halail from all positions and jobs held by Abu-Halail in the PA and/or PLO and from all work and employment performed by Abu-Halail for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Abu-Halail in the PA and/or PLO and of all work and employment performed by Abu-Halail for the PA and/or PLO, between January 1, 2000 and today; (ii); the rank or ranks held by Abu-Halail between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Abu-Halail held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Abu-Halail between January 1, 2000 and today.

d. All documents concerning all payments made and all benefits provided to Abu-Halail and/or Abu-Halail's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Abu-Halail's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Abu-Halail.

e. All documents concerning Abu-Halail in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Abu-Halail in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Abu-Halail in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Abu-Halail in the paper, computerized, electronic or other files or archives of the MI.

i. All documents concerning Abu-Halail in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Abu-Halail in the paper, computerized, electronic or other files or archives of the PAP.

k. All broadcasts on PA TV concerning Abu-Halail.

10. All documents concerning Ahmed Abu Radab ("Abu Radab"), including without limitation:

a. The complete personnel files for Abu Radab from all positions and jobs held by Abu Radab in the PA and/or PLO and from all work and employment performed by Abu Radab for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Abu Radab in the PA and/or PLO and of all work and employment performed by Abu Radab for the PA and/or PLO, between January 1, 2000 and today; (ii) the rank or ranks held by Abu Radab between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Abu Radab held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Abu Radab between January 1, 2000 and today.

d. All documents concerning all payments made and all benefits provided to Abu Radab and/or Abu Radab's relatives by the PA and/or PLO at any time after the

Terrorist Attack, in relation to, as a result of and/or due to Abu Radab's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Abu Radab.

e. All documents concerning Abu Radab in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Abu Radab in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Abu Radab in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Abu Radab in the paper, computerized, electronic or other files or archives of the MI.

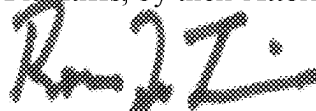
i. All documents concerning Abu Radab in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Abu Radab in the paper, computerized, electronic or other files or archives of the PAP.

k. All broadcasts on PA TV concerning Abu Radab.

November 21, 2012

Plaintiffs, by their Attorney,



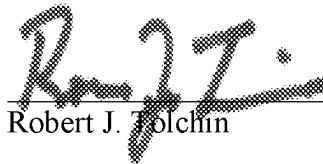
Robert J. Tolchin
111 Livingston Street, Suite 1928
Brooklyn, New York 11201
(718) 855-3627
Fax: (718) 504-4943
RJT@tolchinlaw.com

David I. Schoen
David I. Schoen, Attorney at Law
2800 Zelda Road, Suite 100-6
Montgomery, Alabama 36106
(334) 395-6611
DSchoen593@aol.com

CERTIFICATION

I hereby certify that on November 21, 2012, I caused the within to be served by electronic mail and by hand on the counsel listed below:

Brian A. Hill
MILLER & CHEVALIER CHARTERED
655 15th Street, NW, Suite 900
Washington D.C. 20005-6701



Robert J. Tolchin